

RA 4682026356
U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2022 JUL 26 PM 3:38

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UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

-----X
JOHN DOE,)
)
)
Plaintiff,)
)
)
-against-)
)
)
THE UNIVERSITY OF VERMONT AND)
STATE AGRICULTURAL COLLEGE;)
THE BOARD OF TRUSTEES OF THE)
UNIVERSITY OF VERMONT AND STATE)
AGRICULTURAL COLLEGE; KATHERINE)
SPENCE, individually and as agent for The University)
of Vermont and State Agricultural College; EMILY)
MCCARTHY, individually and as agent for The)
University of Vermont and State Agricultural College;)
ANNA EPSHTEYN, individually and as agent for The)
University of Vermont and State Agricultural College; and)
THOMAS MERCURIO; individually and as agent for)
The University of Vermont and State Agricultural)
College;)
)
)
Defendants.)
-----X

Civil Action No.:

2:22-cv-144

PLAINTIFF'S MOTION FOR ADMISSION
PRO HAC VICE OF NICHOLAS E. LEWIS PURSUANT TO L.R. 83.1(b)

The Plaintiff John Doe, by its undersigned attorneys, respectfully requests the *pro hac vice* admission of Nicholas E. Lewis as co-counsel in association with the undersigned local counsel. In support thereof, the Plaintiff states as follows:

1. Nicholas E. Lewis is a lawyer with the law firm Nesenoff & Miltenberg, LLP, 363 Seventh Avenue, 5th Floor, New York, New York 10013.
2. As the accompanying Affidavit (Exhibit 1) demonstrates, Attorney Nicholas E. Lewis is a member in good standing of the Bar of the State of New York and all other courts to which he is admitted to practice.

3. Attorney Nicholas E. Lewis will be actively associated with undersigned counsel, Evan Barquist, who is a member of the Bar of this Court.

4. Counsel for the Defendant University of Vermont *et al.*, Ritchie Berger, Esq. has been contacted often by Attorney Lewis to discuss the instant matter pre-suit, and has had a professional and courteous relationship with Attorney Lewis for at least two years. While Attorney Lewis believes esteemed opposing counsel would assent to the relief requested by this Motion, he was unable to confirm same today prior to the instant filing.

5. No memorandum in support of this motion is necessary as the relief sought is within the discretion of the Court.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

- A. Grant the Motion for Admission *Pro Hac Vice*; and
- B. Grant such other and further relief as may be just and proper.

Dated: July 26, 2022

Respectfully submitted,

JOHN DOE

By his Attorneys,

By:


/s/ Evan Barquist

Evan Barquist, Esq.

VT Bar # 5002

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